

LAW OFFICES OF  
NATALI J.H. TODD, P.C.

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NATALI J.H. TODD  
MEMBER: NY & MA BAR

26 COURT STREET  
SUITE 413  
BROOKLYN, NY 11242-1134

Tel: 718-797-3055  
Fax: 718-504-3900  
E-mail: [natali\\_todd@yahoo.com](mailto:natali_todd@yahoo.com)  
[www.natalitoddlawyer.com](http://www.natalitoddlawyer.com)

June 2, 2022

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

*Re: U.S. v. Angel Manuel Lopez Padilla, 22 Cr. 275 (NRB)*  
*Bail Modification Request*

Dear Judge Buchwald:

I represent Mr. Lopez Padilla in the above captioned matter. On March 17, 2022, Mr. Lopez Padilla was released on bond with the following conditions: \$75,000 unsecured PRB signed by two suretors; home detention enforced by location monitoring; travel restrictions limited to the EDNY/EDNY, and supervised by pretrial services with all other standard conditions.

Supervising Pretrial Officer, Marlon Ovalles, has been supervising Mr. Lopez Padilla since March 17, 2022 and reports that Mr. Lopez Padilla has been in full compliance with his bail conditions since the date of his release and noted that because of the home detention restrictions, Mr. Lopez has had difficulty securing new employment. Pretrial Officer Ovalles is recommending a modification of Mr. Lopez Padilla's bail conditions from home detention to curfew, with hours set by Pretrial Services, enforced by location monitoring.

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Counsel is respectfully requesting that the Court modify Mr. Lopez Padilla's bail conditions to curfew, with hours set by Pretrial Services, enforced by Location Monitoring. The government and Pretrial Services consent to this request.


Thank you for your accommodation.

Respectfully,

*N. Todd*  
Natali Todd, Esq.

cc: AUSA Kevin Mead (via email)  
Marlon Ovalles, PTSO (via email)

SO ORDERED

  
Hon. Naomi Reice Buchwald  
United States District Judge

June 3, 2022  
New York, NY